

Margaret M. Fox

pfox@mcnair.net
T 803.799.9800
F 803.753.3278

June 29, 2015

Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Rate Floor Certifications for 2015 Pursuant to Federal Communications
Commission Regulation 47 C.F.R. §54.313(h)
Docket No. 2013-268-C

Dear Ms. Boyd:

Federal Communications Regulation 47 C.F.R. § 54.313(h) requires certain incumbent local exchange carriers to report rate floor data by July 1 of each year. Specifically, the FCC regulation requires as follows:

- (h) *Additional voice rate data.* (1) All incumbent local exchange carrier recipients of high-cost support must report all of their rates for residential local service for all portions of their service area, as well as state fees as defined pursuant to § 54.318(e), to the extent the sum of those rates and fees are below the rate floor as defined in § 54.318, and the number of lines for each rate specified. Carriers shall report lines and rates in effect as of June 1.

The rate floor established pursuant to § 54.318 for the period beginning July 1, 2015 (rates in effect as of June 1, 2015) is \$21.22.¹ Thus, only incumbent local exchange companies that receive high-cost support *and* have rates below the \$21.22 rate floor are required to file a report.

¹ See Public Notice DA 15-470 in WC Docket No. 10-90 (rel. April 16, 2015); see also Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, *In the Matter of Connect America Fund, Universal Service Reform – Mobility Fund, ETC Annual Reports and Certifications, Establishing Just and Reasonable Rates for Local Exchange Carriers, and Developing an Unified Intercarrier Compensation Regime*, WC Docket No. 10-90, WT Docket No. 10-208, WC Docket No. 14-58, WC Docket No. 07-135, CC Docket No. 01-92, FCC 14-54 (rel. June 10, 2014), at ¶¶ 80 and 84 (The FCC waived the application of section 54.318(b) of its rules for lines reported July 1, 2015 with a rate of \$16 or above, but did not waive section 54.313(h) of the rules and, therefore, incumbent ETCs must report rates to the extent they fall below the announced urban rate floor of \$21.22).

Ms. Jocelyn Boyd
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MCNAIR
ATTORNEYS

A copy of any required reports must be filed with the state commission. *See* 47 C.F.R. § 54.313(i). Attached please find the required information for the South Carolina Telephone Coalition companies listed in Attachment A.

The line count information reported by the companies is competitively sensitive information. Accordingly, a motion for confidential treatment accompanies this filing, and we are providing both public redacted and confidential versions of the filing.

If you should need further information, please do not hesitate to contact me.

Very truly yours,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

MMF:dmf
Enclosure

cc: Christopher Rozycki, ORS

South Carolina Telephone Coalition Member Companies
Rate Floor Certification 2015

Bluffton Telephone Company, Inc.
Farmers Telephone Cooperative, Inc.
Hargray Telephone Company, Inc.
Home Telephone ILEC, LLC d/b/a Home Telecom
Lockhart Telephone Company, d/b/a TruVista
McClellanville Telephone Company (TDS)
Norway Telephone Company (TDS)
Palmetto Rural Telephone Cooperative, Inc.
PBT Telecom, d/b/a Comporium
West Carolina Rural Telephone Cooperative, Inc.

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA

Re: Rate Floor Certifications for 2015 pursuant to Federal)
 Communications Commission Regulation 47 C.F.R.)
 §54.313(h))
_____)

MOTION REQUESTING THAT MATERIALS BE TREATED AS CONFIDENTIAL

The South Carolina Telephone Coalition (see attached list of companies) (“SCTC”) respectfully requests that the South Carolina Public Service Commission (“Commission”) treat the materials accompanying this motion as confidential. This motion is made on the following grounds:

1. Incumbent local exchange carrier Eligible Telecommunications Carriers (“ETCs”) who receive federal high cost support are required to report all of their rates for residential local service for all portions of their service area, as well as state fees as defined in rules promulgated by the Federal Communications Commission (“FCC”), to the extent the sum of those rates and fees are below the urban rate floor established by the FCC, and the number of lines for each rate specified. The rate floor that has been established by the FCC for purposes of this report for the July 1, 2015 filing is \$21.22.¹ The report is required to be filed with the FCC, the Universal Service Administrative Company (“USAC”), and the relevant state commissions or Tribal governments, as appropriate. *See* 47 C.F.R. § 54.313(i).

¹ ¹ *See* Public Notice DA 15-470 in WC Docket No. 10-90 (rel. April 16, 2015).
COLUMBIA 1167245v2

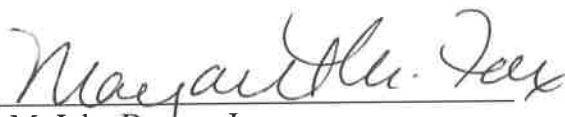
2. The rate floor data report contains line count information for various rates. This information is confidential, proprietary, competitively-sensitive business information which, if disclosed, would cause competitive harm to the companies. Protection of such confidential and proprietary information is consistent with Commission precedent.

3. We ask that the materials described above be afforded confidential treatment by the Commission. In accordance with the Commission's guidelines, as set forth in Commission Order No. 2005-226, "Order Requiring Designation of Confidential Materials," the accompanying confidential materials are being filed in a separate envelope, which is clearly marked "Confidential." Each confidential page of the materials is clearly marked "Confidential." We are also providing a public redacted version of the filing.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that the Commission treat the accompanying materials as confidential, for the reasons stated herein.

Respectfully submitted,

McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

By: 
M. John Bowen, Jr.
Margaret M. Fox

ATTORNEYS FOR THE SOUTH CAROLINA
TELEPHONE COALITION

Columbia, South Carolina
June 29, 2015

South Carolina Telephone Coalition Member Companies
Rate Floor Certification 2015

Bluffton Telephone Company, Inc.

Farmers Telephone Cooperative, Inc.

Hargray Telephone Company, Inc.

Home Telephone ILEC, LLC d/b/a Home Telecom

Lockhart Telephone Company, d/b/a TruVista

McClellanville Telephone Company (TDS)

Norway Telephone Company (TDS)

Palmetto Rural Telephone Cooperative, Inc.

PBT Telecom, d/b/a Comporium

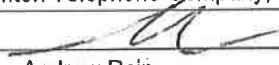
West Carolina Rural Telephone Cooperative, Inc.

Bluffton Telephone Company, Inc.
Rate Floor Certification and Data
Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier Bluffton Telephone Company, Inc.			
Signature of authorized officer 			Date 06/11/2015
Printed name of authorized officer Andrew Rein			
Title or position of authorized officer Interim Chief Financial Officer			
Telephone number of authorized officer: (843) 686-1246, ext.			
Study Area Code of Reporting Carrier	240512	Filing Due Date for this form (mm/dd/yyyy)	07/01/2015

REDACTED
RATE FLOOR DATA

Farmers Telephone Cooperative, Inc.

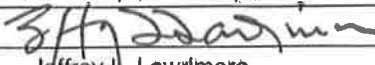
Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier Farmers Telephone Cooperative, Inc.			
Signature of authorized officer 			Date June 9, 2015
Printed name of authorized officer Jeffrey L. Lawlmore			
Title or position of authorized officer Chief Financial Officer			
Telephone number of authorized officer: (843) 382-1381 , ext. _____			
Study Area Code of Reporting Carrier	240520	Filing Due Date for this form (mm/dd/yyyy)	07/01/2016

REDACTED
RATE FLOOR DATA

Hargray Telephone Company, Inc.

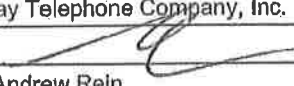
Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier Hargray Telephone Company, Inc.			
Signature of authorized officer 			Date 06/11/2015
Printed name of authorized officer Andrew Rein			
Title or position of authorized officer Interim Chief Financial Officer			
Telephone number of authorized officer: (843) 686-1246 ext.			
Study Area Code of Reporting Carrier	240523	Filing Due Date for this form (mm/dd/yyyy)	07/01/2015

REDACTED
RATE FLOOR DATA

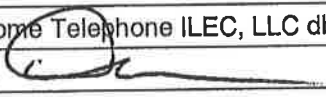
Home Telephone ILEC, LLC d/b/a Home Telecom
Rate Floor Certification and Data
Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier Home Telephone ILEC, LLC dba Home Telecom

Signature of authorized officer 

Date 6/1/2015

Printed name of authorized officer Denny Thompson

Title or position of authorized officer Director, Administrative Services

Telephone number of authorized officer: (843) 761-9173 ext.

Study Area Code of Reporting Carrier

240527

Filing Due Date for this form
(mm/dd/yyyy)

07/01/2015

REDACTED
RATE FLOOR DATA

Lockhart Telephone Company, d/b/a TruVista

Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data			
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported; and, to the best of my knowledge, the information reported on this form is accurate.			
Name of Reporting Carrier	LOCKHART TELEPHONE COMPANY		
Signature of authorized officer	<i>Thomas Harper</i>	Date	6-4-15
Printed name of authorized officer	THOMAS HARPER		
Title or position of authorized officer	VICE PRESIDENT - ADMINISTRATION & REGULATORY AFFAIRS		
Telephone number of authorized officer: (803) 581-9164 ext.			
Study Area Code of Reporting Carrier	240532	Filing Due Date for this form (mmddyyyy)	07/01/2015

REDACTED
RATE FLOOR DATA

McClellanville Telephone Company (TDS)

Rate Floor Certification and Data

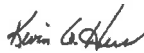
Pursuant to 47 C.F.R. §§ 54.313(h)

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include the accuracy of the actual rate floor data reported; and to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier	See TDS Telecom ILEC Listing Below
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Signature of Authorized Officer	Date 6/11/2015
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Printed name of Authorized Officer	Kevin G. Hess
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Title or position of Authorized Officer	Executive Vice President
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Telephone number or Authorized Officer.	(608)664-4160 ext. _ _ _ _
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Study Area Code of Reporting Carrier	See TDS TELECOM ILEC Listing Below		Filing Due Date for this form (mm/dd/yyyy)	7/1/2015	
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Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

See attachment 1 for listing of TDS Telecom ILECs

Attachment 1

250311	Oakman Telephone Company, Inc	361413	Mid-State Telephone Company dba KMP
250314	Peoples Telephone Company, Inc	287449	Myrtle Telephone Company, Inc
452171	Arizona Telephone Company	150092	Edwards Telephone Company, Inc
452174	Southwestern Telephone Company	150129	Township Telephone Company, Inc
542323	Winterhaven Telephone Company	300662	The Vanlue Telephone Company
320744	Camden Telephone Company, Inc	432010	Mid-America Telephone, Inc
320809	Communications Corporation of Southern Indiana	532404	Asotin Telephone Company-OR
320788	The Merchants & Farmers Telephone Company	240533	McClellanville Telephone Company, Inc
320816	S and W Telephone Company, Inc	240535	Norway Telephone Company, Inc
100005	Cobbosseecontee Telephone Company	290559	Concord Telephone Exchange, Inc
361362	Bridge Water Telephone Company	230469	Barnardsville Telephone Company

REDACTED
RATE FLOOR DATA


Norway Telephone Company (TDS)
Rate Floor Certification and Data
Pursuant to 47 C.F.R. §§ 54.313(h)

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include the accuracy of the actual rate floor data reported; and to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier **See TDS Telecom ILEC Listing Below**

Signature of Authorized Officer



Date 6/11/2015

Printed name of Authorized Officer Kevin G. Hess

Title or position of Authorized Officer Executive Vice President

Telephone number of Authorized Officer. (608)664-4160 ext. _ _ _ _

Study Area Code of Reporting Carrier

**See TDS
TELECOM
ILEC Listing
Below**

Filing Due Date for this form
(mm/dd/yyyy)

7/1/2015

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

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100005	Cobbosseecontee Telephone Company	290559	Concord Telephone Exchange, Inc
361362	Bridge Water Telephone Company	230469	Barnardsville Telephone Company

REDACTED
RATE FLOOR DATA

Palmetto Rural Telephone Cooperative, Inc.

Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier **Palmetto Rural Telephone Cooperative, Inc.**

Signature of authorized officer

Date **6/4/2015**

Printed name of authorized officer

Jason J. Dandridge

Title or position of authorized officer

Chief Executive Officer

Telephone number of authorized officer: **(843) 538-9090** ext.

Study Area Code of Reporting Carrier

240536

Filing Due Date for this form
(mm/dd/yyyy)

07/01/2015

REDACTED
RATE FLOOR DATA

**PBT Telecom, d/b/a Comporium
Rate Floor Certification and Data
Pursuant to 47 C.F.R. §§ 54.313(h)**

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier PBT Telecom, Inc.

Signature of authorized officer

L.B. Spearman

Date 06/26/2015

Printed name of authorized officer

L.B. Spearman

Title or position of authorized officer

Vice President

Telephone number of authorized officer: (803) 210-5528 ext.

Study Area Code of Reporting Carrier

240539

Filing Due Date for this form
(mm/dd/yyyy)

07/01/2015

REDACTED
RATE FLOOR DATA

West Carolina Rural Telephone Cooperative, Inc.

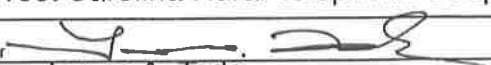
Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)

Rate Floor Template

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier				West Carolina Rural Telephone Cooperative, Inc.	
Signature of authorized officer				 Date June 4, 2015	
Printed name of authorized officer				Lance A. Tade	
Title or position of authorized officer				Chief Financial Officer	
Telephone number of authorized officer:				864 446 9256	
Study Area Code of Reporting Carrier		240550		Filing Due Date for this form (mm/dd/yyyy) 07/01/2015	

REDACTED
RATE FLOOR DATA